

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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E. JEAN CARROLL,

Index No. 160694/2019

Plaintiff,

- against -

DONALD J. TRUMP, in his personal capacity,

**AFFIRMATION OF
LAWRENCE S. ROSEN**

Defendant.

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STATE OF NEW YORK }
 } ss:
COUNTY OF NEW YORK }

LAWRENCE S. ROSEN, an attorney duly admitted to practice before the Courts of the State of New York, affirms under penalty of perjury as follows:

1. I am a partner at LaRocca Hornik Rosen & Greenberg LLP, attorneys for defendant Donald J. Trump, and am personally familiar with the facts and circumstances set forth herein.
2. I submit this affirmation in support of President Trump's application for an order (i) dismissing plaintiff's Complaint, pursuant to CPLR 3211(a)(8), for lack of personal jurisdiction, and (ii) staying the discovery deadlines set forth in the Court's December 12, 2019 Order (the "Preliminary Conference Order") pending the hearing of the instant motion.
3. Attached as **Exhibit A** is a true and correct copy of plaintiff's Complaint.
4. Attached as **Exhibit B** is a true and correct copy of the Court's November 13, 2019 *ex parte* order allowing for service on President Trump to be effectuated through his attorneys, pursuant to CPLR 308(5).
5. Attached as **Exhibit C** is a true and correct copy of the Preliminary Conference Order, wherein the Court ordered the parties to, among other things, exchange written discovery

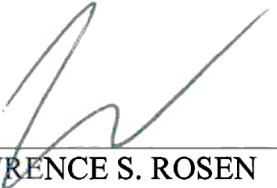
and conduct party depositions on or before February 6 and April 6, 2020, respectively. President Trump respectfully requests that the Court stay the discovery deadlines set forth in the Preliminary Conference Order pending a hearing on the instant motion.

6. The undersigned informed the attorneys for plaintiff via telephone that President Trump would be seeking a stay of discovery in Court today.

7. Based on the points and authorities set forth in the accompanying memorandum of law, President Trump respectfully requests that the Court grant the instant motion in its entirety.

8. No prior request for the relief sought herein has previously been made.

Dated: New York, New York
January 3, 2020



LAWRENCE S. ROSEN